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November 8, 2019

Hon. John G. Koeltl  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse – Room 14A  
500 Pearl St.  
New York, NY 10007-1312

Via: ECF & Fax

**Re: 1:18-cr-00662-JGK USA v. Jones**

**Subj.: Extension Request to File Rule 29 and Rule 33 post-verdict motions**

Dear Honorable Koeltl:

This office represents Michael Jones in the above-captioned matter. I write the Court to request an extension of the deadline to file a motion for judgment of acquittal pursuant to Rule 29 and motion for a new trial pursuant to Rule 33.

Mr. Jones was convicted of Count 1 and acquitted of the statutory enhancement on October 28, 2019. Pursuant to Rule 29 and Rule 33, Mr. Jones' motion for judgment of acquittal and motion for new trial is due to be filed on November 11, 2019. Based upon the complexity of Mr. Jones' motion and my other obligations, I am requesting a 14-day extension to file his post-verdict motions.

We appreciate the Court's consideration to our request.

Sincerely,

JUSTIN BONUS, ESQ.

/s/Justin Bonus  
Justin Bonus, Esq.

Via ECF  
Thane Rehn  
Assistant United States Attorney  
United States Attorney's Office  
Southern District of New York

*Time to file post-verdict motions  
pursuant to Rules 29 and 33 of the  
Federal Rules of Criminal Procedure  
is extended to November 25, 2019.*

*So ordered.  
J. G. Koeltl  
11/8/19. U.S.D.N.Y.*

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